

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**DEREK LAMB on Behalf of Himself and  
on Behalf of All Others Similarly Situated,**

**Plaintiff,**

**V.**

**BRAHAMPUTRA, LLC,**

**Defendant.**

**CIVIL ACTION NO.: 2:20-cv-12145**

**NOTICE OF PLAINTIFF'S MOTION FOR EQUITABLE TOLLING**

PLEASE TAKE NOTICE THAT on May 2, 2022, Plaintiff Derek Lamb will move this Court, before the Honorable Leda Wettre, United States Magistrate Judge of the United States District Court for the District of New Jersey, for an Order equitably tolling the limitations period for the potential Fair Labor Standards Act claims of the putative collective members.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiff shall rely upon the Notice, the Memorandum of Law, the accompanying exhibits, and the proposed Order herein.

DATED: April 7, 2022

Respectfully submitted,

/s/ Andrew Glenn

Andrew Glenn, Esq.

JAFFEGLENN LAW GROUP, PA

350 Carnegie Center, Suite 150

Princeton, New Jersey 08540

Tel: (201) 687-9977; Fax: (201) 595-0308

aglenn@jaffeglenn.com

/s/ William M. Hogg

Don J. Foty (*Pro Hac Vice*)

William M. Hogg (*Pro Hac Vice*)

HODGES & FOTY, LLP  
4409 Montrose Boulevard, Suite 200  
Houston, Texas 77006  
Tel: (713) 523-0001; Fax: (713) 523-1116  
dfoty@hftrialfirm.com  
whogg@hftrialfirm.com

*Counsel for Plaintiff and Collective  
Members*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2022, I electronically filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Andrew Glenn  
Andrew Glenn